

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

Larry Reid, et al.,

Plaintiffs,

— vs —

Darryl Moore,

Defendant.

Case No. 1:21-cv-00991

Judge James S. Gwin

Magistrate Judge Jonathan Greenberg

Motion of the Plaintiffs to
Enforce Settlement Agreement

Now come the Plaintiffs, Larry D. Reid and Larry Reid Live, LLC, by and through undersigned counsel, who respectfully move the Court for an Order enforcing the terms of the Settlement Agreement that was: **(a)** signed by the Defendant on December 17, 2021; **(b)** violated by the Defendant on December 20, 2021, and; **(c)** is being violated by the continuing presence, online, of dozens of videos—including new videos—which, under the terms of the Settlement Agreement, were to have been removed by Moore no later than 5:00 p.m. on December 20, 2021.

For these reasons, the Plaintiffs respectfully move the Court to: **(1)** declare the Defendant has violated the terms of the Settlement Agreement; **(2)** to issue a mandatory injunction that requires the Defendant to perform the actions to which he agreed in the Settlement Agreement, including removing from the Internet all content that in any way refers or relates to the Plaintiffs, or either of them; **(3)** to permanently enjoin the Defendant from publishing or circulating online content that meets the description, set forth in the Settlement Agreement, of what he agreed not to publish; **(4)** to declare that the Court has found that failing to remove the agreed upon content from the Internet, and publishing new content regarding Reid, violates the Settlement Agreement, and; **(5)** Ordering the Defendant to pay the attorney fees incurred by the Plaintiffs in connection with the preparation and filing of this Motion and its supporting Memorandum.

The bases for this Motion, and for the relief being sought, are stated in the Memorandum filed herewith and incorporated by reference herein.

Respectfully submitted

/s/ Raymond V. Vasvari, Jr.

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– **Certificate of Service** –

The foregoing was filed today, Wednesday, December 22, 2021, via the Court Electronic Filing System. Service will be made upon counsel of record by, and copies of this filing may be obtained through operation of the CM / ECF System.

Respectfully submitted

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One of the attorneys for the Plaintiffs

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